

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

“LILY,” “SARAH,” PIKES PEAK)	
PROBATE SERVICES as Conservator for)	
“SIERRA,” “SOLOMON,” “HENLEY,”)	
WILLIAM E. DUSSAULT as Guardian ad)	
Litem for “VIOLET,” a minor, JANE ROE,)	Case No: 6:22-cv-03329-MDH
as next of friend for “PIA,” a minor,)	
“JENNY”, and “FIONA.”)	
)	
Plaintiffs,)	
)	
v.)	
)	
MICHAEL MILLIMAN,)	
)	
Defendant.)	

**UNOPPOSED MOTION TO EXTEND TIME
TO RESPOND TO COMPLAINT**

COMES NOW Defendant Michael Milliman (“Defendant”), by and through his undersigned counsel, and pursuant to Federal Rule of Civil Procedure 6(b) moves the Court to enter an order extending the time for Defendant to answer or otherwise respond to the Complaint. In support, Defendant states as follows:

1. Plaintiffs filed their Complaint in above-captioned action on December 28, 2022. Plaintiffs’ Complaint asserts claims under 18 U.S.C. § 2252(a)(4)(B) and (b)(2).
2. Plaintiffs served Defendant with the Summons and Complaint on March 15, 2023. *See* Doc. 7.
3. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Defendant’s deadline to answer or otherwise respond to Plaintiff’s Complaint is April 5, 2023. *See* Doc. 7 (“RETURN OF SERVICE of complaint executed by All Plaintiffs. Michael Milliman served on 3/15/2023, answer due 4/5/2023.”).

4. Defendant respectfully requests that the Court extend his deadline to answer or otherwise respond to the Complaint by a period of twenty-one (21) days, through and including April 25, 2023. This extension is necessary to allow Defendant and his counsel time to, *inter alia*, review the allegations in the Complaint and prepare a response. Counsel's work in this regard has been complicated by Defendant's current incarceration in Federal prison in North Carolina, which delays and complicates counsel's ability to communicate with Defendant.

5. Counsel for Defendant contacted counsel for Plaintiffs regarding this request for extension. In response, counsel for Plaintiffs advised that they do not oppose Defendant's requested extension of time to answer or otherwise respond to the Complaint.

6. This is Defendant's first request to extend his deadline to answer or otherwise respond to the Complaint. This case is not set for trial and no scheduling order has been entered in this action. Defendant avers that he does not seek to delay these proceedings and makes this request in good faith. To the best of Defendant's knowledge, this requested extension will not prejudice Plaintiffs and Plaintiffs have not articulated any such prejudice.

WHEREFORE, for the reasons stated herein and for good cause shown, Defendant respectfully requests that the Court enter an order extending his deadline to answer or otherwise respond to Plaintiffs' Complaint by a period of twenty-one (21) days, through and including April 25, 2023.

[Signature follows.]

Dated: April 4, 2023

STINSON LLP

By: /s/ James D. Bass
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 4th day of April, 2023, the above and foregoing was filed with the Clerk of the Court through the CM/ECF system, which will send electronic notification to all counsel of record.

/s/ James D. Bass
ATTORNEY FOR DEFENDANT